

Exhibit B

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

NEIMAN MARCUS GROUP LTD LLC, *et al.*,¹

Reorganized Debtors.

)
)
) Chapter 11
)
) Case No. 20-32519 (DRJ)
)
) (Jointly Administered)
)

**ORDER SUSTAINING LIQUIDATING TRUSTEE'S
SEVENTEENTH OMNIBUS OBJECTION TO CLAIMS
(NO SUPPORTING DOCUMENTS CLAIMS)**

[Related Docket No. _____]

Upon the Objection² of the Liquidating Trustee seeking entry of an order (the “Order”) disallowing and expunging the claims identified on **Schedule 1** attached hereto, it is **HEREBY ORDERED THAT:**

1. The Objection is sustained as set forth herein.
2. Each claim identified on **Schedule 1** to this Order is disallowed in its entirety as identified on **Schedule 1** to this Order.

¹ The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, are: Neiman Marcus Group LTD LLC (9435); Bergdorf Goodman Inc. (5530); Bergdorf Graphics, Inc. (9271); BG Productions, Inc. (3650); Mariposa Borrower, Inc. (9015); Mariposa Intermediate Holdings LLC (5829); NEMA Beverage Corporation (3412); NEMA Beverage Holding Corporation (9264); NEMA Beverage Parent Corporation (9262); NM Bermuda, LLC (2943); NM Financial Services, Inc. (2446); NM Nevada Trust (3700); NMG California Salon LLC (9242); NMG Florida Salon LLC (9269); NMG Global Mobility, Inc. (0664); NMG Notes PropCo LLC (1102); NMG Salon Holdings LLC (5236); NMG Salons LLC (1570); NMG Term Loan PropCo LLC (0786); NMG Texas Salon LLC (0318); NMGP, LLC (1558); The Neiman Marcus Group LLC (9509); The NMG Subsidiary LLC (6074); and Worth Avenue Leasing Company (5996). The Reorganized Debtors' service address is: One Marcus Square, 1618 Main Street, Dallas, Texas 75201.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Liquidating Trustee's Seventeenth Omnibus Objection to Claims (No Supporting Documents Claims)*.

3. Bankruptcy Management Solutions, Inc. d/b/a Stretto (“Stretto”) is authorized and directed to update the claims register maintained in these chapter 11 cases to reflect the relief granted in this Order.

4. Each claim and the objections by the Liquidating Trustee to each claim identified in **Schedule 1** constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each claim identified on **Schedule 1**.

5. Notwithstanding the relief granted in this Order or any actions taken pursuant to such relief, nothing in this Order shall be deemed: (a) an admission as to the validity of any prepetition claim against a Debtor entity or such Debtor entity’s estate; (b) a waiver of any party’s right to dispute any prepetition claim on any grounds; (c) a promise or requirement to pay any prepetition claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Objection or any order granting the relief requested by this Objection; (e) a request or authorization to assume any prepetition agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; or (f) a waiver of the Liquidating Trustee’s rights under the Bankruptcy Code or any other applicable law.

6. The terms and conditions of this Order will be immediately effective and enforceable upon its entry.

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7. The Liquidating Trustee, Stretto, and the Clerk of the Court are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Objection.

8. This Court shall retain exclusive jurisdiction to resolve any dispute arising from or related to this Order.

Houston, Texas

Date: _____, 2021

THE HONORABLE DAVID R. JONES
CHIEF UNITED STATES BANKRUPTCY
JUDGE

Schedule 1

Ref #	Name of Claimant	Debtor Name	Claim #	Date Filed	Claim to be Disallowed	Reason for Objection
1	BEFRUGAL	Neiman Marcus Group LTD LLC	1330	6/19/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$37,594.95 Total: \$37,594.95	Claim does not include supporting documentation
2	BRAD'S DEALS LLC	The Neiman Marcus Group LLC	888	5/26/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$3,203.77 Total: \$3,203.77	Claim does not include supporting documentation
3	CENTRAL TELEPHONE COMPANY- NEVADA DBA CENTURYLINK	Neiman Marcus Group LTD LLC	1593	7/14/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$1,159.26 Total: \$1,159.26	Claim does not include supporting documentation
4	CENTRAL TELEPHONE COMPANY- NEVADA DBA CENTURYLINK	Neiman Marcus Group LTD LLC	1592	7/14/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$666.91 Total: \$666.91	Claim does not include supporting documentation
5	CESAR DUENAS	Neiman Marcus Group LTD LLC	828	5/23/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$700.00 Total: \$700.00	Claim does not include supporting documentation
6	DLNY, LLC A DIVISION OF JERRY LEIGH OF CALIFORNIA, INC	Neiman Marcus Group LTD LLC	564	5/18/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$6,275.00 Total: \$6,275.00	Claim does not include supporting documentation
7	HAWAII EMPLOYMENT SERVICES, INC	Neiman Marcus Group LTD LLC	1672	7/14/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$7,569.01 Total: \$7,569.01	Claim does not include supporting documentation
8	JAMES JEANS	Neiman Marcus Group LTD LLC	960	5/28/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$3,632.00 Total: \$3,632.00	Claim does not include supporting documentation
9	POMEROY	Neiman Marcus Group LTD LLC	755	5/21/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$38,081.71 Total: \$38,081.71	Claim does not include supporting documentation

Ref #	Name of Claimant	Debtor Name	Claim #	Date Filed	Claim to be Disallowed	Reason for Objection
10	TOGAS HOUSE OF TEXTILES	Neiman Marcus Group LTD LLC	636	5/19/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$3,551.00 Total: \$3,551.00	Claim does not include supporting documentation
11	TOOTIE PIE CO.	Neiman Marcus Group LTD LLC	38	5/7/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$13,708.00 Total: \$13,708.00	Claim does not include supporting documentation
12	WHITLOCK (AUDIO FIDELITY COMMUNICATIONS CORP)	Neiman Marcus Group LTD LLC	2585	8/3/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$17,243.20 Total: \$17,243.20	Claim does not include supporting documentation
13	DERRALL BROWN	Neiman Marcus Group LTD LLC	1618	7/13/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00 Total: \$0.00	Claim does not include supporting documentation
14	EBONE BOWLES	Neiman Marcus Group LTD LLC	1655	7/13/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00 Total: \$0.00	Claim does not include supporting documentation
15	MONICA WRIGHT-SAPAR	Neiman Marcus Group LTD LLC	2365	7/20/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00 Total: \$0.00	Claim does not include supporting documentation
16	OSCAR ALVAREZ	Neiman Marcus Group LTD LLC	1746	7/15/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00 Total: \$0.00	Claim does not include supporting documentation
17	SA-LA LLC	Neiman Marcus Group LTD LLC	1229	6/14/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00 Total: \$0.00	Claim does not include supporting documentation

Ref #	Name of Claimant	Debtor Name	Claim #	Date Filed	Claim to be Disallowed	Reason for Objection
18	WESLYN BRIGNONI	Neiman Marcus Group LTD LLC	1617	7/13/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00 Total: \$0.00	Claim does not include supporting documentation